

Honorable Julius Genachowski, Chairman  
Commissioner Michael J. Copps  
Commissioner Robert M. McDowell  
Commissioner Mignon Clyburn  
Commissioner Meredith Attwell Baker  
Federal Communications Commission  
445 Twelfth Street SW  
Washington, DC 20554

Re: CG Docket Nos. 03-123 and 10-51

Dear Chairman Genachowski and Commissioners Copps, McDowell, Clyburn, and Baker,

I am currently employed by a VRS provider and have had the phenomenal opportunity of working in an environment that allows deaf and hard of hearing individuals the opportunity to communicate in real time through the implementation of VRS and its efficient technologies. VRS providers and the technologies that they employ have and continue to be a key step toward further connecting deaf and hearing communities. I have the astute privilege of witnessing this happen daily and I get to directly see how it continually makes bridging the communication gap between the two worlds, hearing and deaf, easier by the minute.

Just recently I have been made aware of the Commissions public Notice regarding the VRS rates and funds. Unfortunately at these proposed rates by the FCC, the VRS industry would suffer a tremendous impediment and in the long run may even cease to exist in general. No VRS company would be able to handle the immense demands of their consumers at these low rates. If VRS as an industry went under, and deaf consumers were forced to go back to using TTY technology, as a human race we would be taking a giant step backwards in our efforts to create a more sustainable equality among all people. In congruence with the previous statement if the VRS industry were to be shut down, then it would result in the extensive loss of income for the thousands of people that the industry employs. And seeing how the VRS industry has more deaf employees than any other trade in this country, it would cause yet another great setback for the deaf community. To be able to cover the legitimate business expenditures of running a fully functional VRS company that complies to all of the current standards set by the FCC and to ensure a high level of customer service to their consumers, a higher VRS Rate than the one proposed is needed

It has proven rather difficult in this industry to try and create a budget for business costs when the rate at which VRS companies are paid at, is constantly being lowered at an undisclosed rate every year. I do however appreciate the last ruling set up by the FCC that gave the industry a three year interim VRS Rate instead of the previous one year rate. And although I believe it should have been for a longer period of time than three years, I thought that it was a step in the right direction. But once

again the FCC is proposing a low interim VRS rate, which in turn would be indirectly impacting the deaf community in a negative way. I say this because a VRS provider should constantly be investing into new opportunities, technologies and consumer offerings for the deaf community. VRS providers need to continue to do this, so that they can strive to get ever closer to the overall goal of creating a functional equivalence, which is a cornerstone mandate in the Americans with Disabilities Act,

and which continues to be the driving force behind this industry. Investing in these new ideas of improving life for the deaf community cannot happen at the level it needs to if the VRS rate is constantly being lowered. But the only way a VRS can invest in these opportunities and maintain a sound business structure for their employees to depend upon, would be to know how much the company is going to earn at the rate at which it is to be reimbursed, on a wider scale than simply a year. For most companies this is easy to do because they are able to project upon sales trends and rates that fluctuate between a fixed set of expenditures, but in the VRS industry it is difficult because VRS companies are dependent on a rate that is ever decreasing in a rapid manner. That is why I propose that the FCC adopt a multi-year VRS rate, so that as an industry, VRS providers can run successful businesses that have and will continue to put the needs of the deaf and hard of hearing community at the forefront.

It would be a shame if the FCC were to severely hinder or possibly destroy the service that VRS provides, by setting such a low rate that would seemingly cripple the businesses that have put forth so much time and effort toward improving the everyday quality of life for the deaf and hard of hearing community. Although VRS has done so much already in the short time it has been around, it has the infinite capability to do so much more in the advancement of functional equivalence for its consumers. The FCC should be most concerned with this facet and should encourage VRS companies to keep expanding their technological capabilities and availability to the deaf community. But once again, lowering the rate to its proposed state would be taking a step in the opposite direction.

It is unfortunate that recent reports of fraud have cast such a dark shadow over the VRS industry as a whole. As an employee of a company that has continued to strictly adhere to the guidelines of the FCC and all the while done its utmost best to persevere its uprightness and integrity, I can say that I am disturbed and that I believe the FCC should continue to try and completely eradicate any and all fraud that jeopardizes the sanctity of the service that VRS provides.

I strongly urge you to establish a fair and predictable rate for VRS that will encourage VRS providers to invest in improving VRS and reaching more deaf individuals. The law requires it and it is the right thing to do.

Sincerely,  
Travis Ellis

